

SILVERMANACAMPORA LLP

Counsel to Kenneth P. Silverman, Esq.,
Chapter 7 Trustee
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(516) 479-6300
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David J. Mahoney

Presentment Date: April 18, 2019

Time: 12:00 p.m. (EST)

Objection Date: April 11, 2019

Time: 4:00 p.m. (EST)

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In Re:

NATIONAL EVENTS HOLDINGS, LLC, *et al.*,

Debtors.

----- X

Chapter 7

Case No.: 17-11556 (JLG)

(Jointly Administered)

**NOTICE OF PRESENTMENT OF TRUSTEE'S APPLICATION FOR ORDER
FIXING LAST DAY FOR FILING PROOFS OF CHAPTER 11 ADMINISTRATIVE
CLAIMS OR INTERESTS FOR NATIONAL EVENTS OF AMERICA, INC. AND
NEW WORLD EVENTS GROUP, INC. DEBTORS' CASES ONLY
AND DESIGNATING FORM AND MANNER OF NOTICE**

PLEASE TAKE NOTICE, that upon the application dated March 21, 2019, (the "**Application**") of Kenneth P. Silverman, Esq., the chapter 7 trustee (the "**Trustee**") of the jointly administered bankruptcy estates of National Events Holdings, LLC, National Events Intermediate, LLC, National Event Company II, LLC, National Event Company III, LLC, and World Events Group, LLC (collectively, the "**LLC Debtors**"), and National Events of America, Inc. and New World Events Group Inc. (collectively, the "**Corporate Debtors**"), which when taken together with the LLC Debtors, collectively, the "**Debtors**"), by his attorneys, SilvermanAcampora LLP, for an order fixing the last day for filing proofs of chapter 11 administrative expense claims in each of the Corporate Debtors' cases, and designating the form and manner of notice (collectively, the "**Requested Relief**"), the Trustee will present an order (the "**Proposed Order**") to the Honorable James L. Garrity, United States Bankruptcy Judge, United States Bankruptcy Court, Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Room 601, New York, New York 10004, for signature on **April 18, 2019 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Application and/or the Proposed Order shall be: (i) made in writing; (ii) conform to the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of this Court; and (iii) be filed with the Clerk of the Bankruptcy Court with a courtesy copy delivered to the Chambers of the Honorable James L. Garrity, United States Bankruptcy Judge, United States Bankruptcy Court, Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, and a copy served upon and received by the Trustee's counsel, SilvermanAcampora LLP, 100 Jericho Quadrangle Suite 300, Jericho, New York 11753, Attn: Ronald J. Friedman, Esq., and the Office of the United States Trustee, Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Serene Nakano, Esq., on or before **April 11, 2019 at 4:00 p.m.** Unless timely objections are filed, the Proposed Order may be signed without a hearing.

PLEASE TAKE FURTHER NOTICE, that if timely objections are filed and served, and if the Court so directs, a hearing will be held before the Honorable James L. Garrity, United States Bankruptcy Judge, on a date to be scheduled by the Court, upon such additional notice as the Court may direct.

Dated: Jericho, New York
March 21, 2019

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq.,
Chapter 7 Trustee of National Events Holdings,
LLC, *et al.*

By: /s/ Ronald J. Friedman
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In Re:

NATIONAL EVENTS HOLDINGS, LLC, *et al.*,

Debtors.

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Chapter 7
Case No.: 17-11556 (JLG)

(Jointly Administered)

**TRUSTEE'S APPLICATION FOR ORDER FIXING LAST DAY FOR FILING PROOFS
OF CHAPTER 11 ADMINISTRATIVE CLAIMS OR INTERESTS AND DESIGNATING
FORM AND MANNER OF NOTICE FOR NATIONAL EVENTS OF AMERICA, INC.
AND NEW WORLD EVENTS GROUP, INC. DEBTORS' CASES ONLY**

**TO: THE HONORABLE JAMES L. GARRITY
UNITED STATES BANKRUPTCY JUDGE**

Kenneth P. Silverman, Esq., the chapter 7 trustee (the "**Trustee**") of the jointly administered bankruptcy estates of National Events Holdings, LLC, National Events Intermediate, LLC, National Event Company II, LLC, National Event Company III, LLC, and World Events Group, LLC (collectively, the "**LLC Debtors**"), and National Events of America, Inc. and New World Events Group Inc. (collectively, the "**Corporate Debtors**"), which when taken together with the LLC Debtors, collectively, the "**Debtors**"), by his attorneys, SilvermanAcampora LLP, submits this application (this "**Application**") seeking entry of an order fixing the last day for filing proofs of chapter 11 post-petition claims or, interests in solely the Corporate Debtors' cases, designating the form and manner of notice, and granting related relief, and respectfully sets forth as follows:

BACKGROUND

1. On June 5, 2017, the LLC Debtors filed voluntary petitions for relief under chapter 11 of Title 11, United States Code (the "**Bankruptcy Code**") in the United States Bankruptcy Court for the Southern District of New York (the "**Court**").

2. By Order dated June 13, 2017, the Court entered an Order for the joint administration of the LLC Debtors' estates (*see Doc. No. 20 in Bankr. S.D.N.Y. 17-11566*).

3. By Order of the Court dated August 7, 2017, the LLC Debtors' chapter 11 cases were converted to chapter 7 liquidation proceedings (*see Doc. No. 143 in Bankr. S.D.N.Y. 17-11566*).

4. By Notice of Appointment dated August 7, 2017, Kenneth P. Silverman, Esq., was appointed Trustee in the LLC Debtors' cases, and has since qualified and is the permanent Trustee in those matters (*see Doc. No. 144 in Bankr. S.D.N.Y. 17-11566*).

5. By Order of this Court dated September 20, 2017, the Trustee's motion for a chapter 11 administrative bar date in the LLC Debtors was granted and all chapter 11 administrative claims in the LLC cases were scheduled to be filed such that they were due to be received by the Court on or before November 17, 2017 (*see Doc. No. 188 in Bankr. S.D.N.Y. 17-11566*).

6. After the arrest by the Federal Bureau of Investigation ("FBI") of the Debtors' chief executive officer, Jason Nissen ("Nissen") for allegedly defrauding victims of \$70 million in a Ponzi scheme, on June 1, 2017, victims of Nissen's scheme commenced state court litigation which resulted in the appointment of Edward J. LoBello, Esq. ("LoBello"), a member of MSE&K, as receiver (the "Receiver") on June 5, 2017, in the Corporate Debtors' cases.

7. On June 28, 2017, the Receiver filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the Court for the Corporate Debtors. Pursuant to a "so-ordered" Stipulation and Order dated September 20, 2017, the Receiver was appointed estate fiduciary (the "Estate Fiduciary") of the Corporate Debtors in their jointly administered chapter 11 bankruptcy cases.

8. The Trustee and the Estate Fiduciary filed a joint motion for the entry of an order (a) substantively consolidating the assets and liabilities of the Debtors. Such motion was resolved on consent pursuant to Order (A) Providing for the Agreed Allocation and Payment of Certain Claims, (B) Converting the Corporate Debtors' Cases to Chapter 7 Cases, effective August 7, 2017, (C) Providing for the Appointment of the Trustee in the Corporate Debtors' Cases, (D) Directing Joint Administration of All of the Chapter 7 Cases, and (E) Granting Related Relief (*see Doc. No. 513 in Bankr. S.D.N.Y. 17-11566*).

9. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A) and (0).

RELIEF REQUESTED

10. By this Application, the Trustee respectfully requests entry of an order under Bankruptcy Code §§ 102(1), 105(a) and 503(a), and Rules 2002, 9006 and 9007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), fixing the last day (the "**Chapter 11 Administrative Claims Bar Date**"), which all claims or interests that arose in the Corporate Debtors' cases from June 28, 2017 through and including August 6, 2017 (the "**Chapter 11 Administrative Period**") must be filed, and approving the form and manner of notice of the Chapter 11 Administrative Claims Bar Date.

11. The Trustee intends to give notice (the "**Chapter 11 Administrative Claims Bar Date Notice**"), substantially in the form annexed to the proposed order (the "**Bar Date Order**") as **Exhibit "1"**, by serving a copy of the Chapter 11 Administrative Claims Bar Date Notice no later than forty-five (45) days prior to the Chapter 11 Administrative Claims Bar Date, by first class mail, upon: (a) the Office of the United States Trustee for Region 2; (b) the Corporate Debtors' counsel and other professionals retained during the Corporate Debtors' Chapter 11 Administrative Period; (c) all persons or entities that have requested notice of the proceedings in the Corporate Debtors' cases; (d) all persons or entities that have filed claims in the Corporate Debtors' cases; (e) all creditors and other known holders of claims as of the Chapter 11 Administrative Period, including all persons or entities listed in the Corporate Debtors' schedules as holding claims; (f) all parties to executory contracts and unexpired leases of the Corporate Debtors; (g) all parties to litigation with the Corporate Debtors, if any; (h) the Internal Revenue Service for the district in which the Corporate Debtors' cases are pending and, if required by Bankruptcy Rule 2002(j), the Securities and Exchange Commission and any other required governmental agencies; (i) all known persons or entities that provided goods or services to the Corporate Debtors during the Chapter 11 Administrative Period; and (j) such additional persons and entities as deemed appropriate by the Trustee.

12. The Trustee requests that all claims arising during the Chapter 11 Administrative Period be filed with the Clerk of this Court, substantially conform to the form annexed to the Bar Date Order as **Exhibit “2”**, and be delivered to the Trustee’s counsel, SilvermanAcampora LLP, at the following address:

SILVERMANACAMPORA LLP
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
Attn: Ronald J. Friedman, Esq.

13. The Trustee further requests that the following entities and individuals not be required, at this time, to file a claim arising during the Chapter 11 Administrative Period:

- a) Any holder of a Chapter 11 Administrative Claim that has been allowed by an order of this Court;
- b) Any holder of a Chapter 11 Administrative Claim for which a separate deadline has been previously fixed by this Court;
- c) A holder of a Chapter 11 Administrative Claim that has been paid or otherwise satisfied in full by the Corporate Debtors;
- d) Any holder of a Chapter 11 Administrative Claim who has already properly filed a Chapter 11 Administrative Claim with the Clerk of the Court against the Corporate Debtors; and
- e) Any professionals retained by the Receiver or Estate Fiduciary in the Corporate Debtors’ cases in accordance with Bankruptcy Code §327 for professional fees and reimbursement of expenses.

14. The Trustee further requests that any person or entity asserting a Chapter 11 Administrative Claim that is a professional who was retained by the Corporate Debtors, Receiver, or Estate Fiduciary, and whose retention was authorized, or sought to be approved, by the Court during the Chapter 11 Administrative Period (the “**Debtors’ Chapter 11 Professionals**”), must file an application for payment that complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules of this Court, and the Fee Guidelines promulgated by the Office of the United States Trustee by no later than the Chapter 11 Administrative Claims Bar Date. Any of the Corporate Debtors’ Chapter 11 Professionals who fail to timely file its application may be barred from asserting a Chapter 11 Administrative Claim in the Corporate Debtors’ cases.

15. The Trustee also requests that that any person or entity that is asserting a Chapter 11 Administrative Claim against the Corporate Debtors arising from the rejection of an executory

contract or unexpired lease, as to which the order authorizing such rejection is dated on or before the Chapter 11 Administrative Claims Bar Date, must file a Chapter 11 Administrative Claim based on such rejection on or before the Chapter 11 Administrative Claims Bar Date.

CONCLUSION

16. The Trustee submits that the Chapter 11 Administrative Claims Bar Date Notice is proper and sufficient pursuant to Bankruptcy Code § 102 and Bankruptcy Rules 2002, 9006, and 9007.

17. The Trustee also submits that setting the Chapter 11 Administrative Claims Bar Date is necessary to ascertain the amounts owed to potential holders of administrative claims of the Corporate Debtors arising during the Chapter 11 Administrative Period, and will provide certainty regarding the nature and amount of claims being asserted against the Corporate Debtors' estates.

18. In light of the foregoing, the Trustee submits that granting the Application is in the best interest of the Corporate Debtors' estates, the Corporate Debtors' creditors, and other parties in interest.

WHEREFORE, the Trustee respectfully requests that this Court grant the relief requested herein and grant such further relief as this Court deems proper.

Dated: Jericho, New York
March 21, 2019

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq.,
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